

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:)
)
) Case No. 13-23878-svk
) Chapter 13
MICHELLE WOLFE,)
)
)
Debtors.)

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

Please take notice that the debtors, Michelle Wolfe, by their attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, hereby object to the Motion to Dismiss as brought by Mary B. Grossman, Chapter 13 Trustee.

The debtor asserts that she was not required to file taxes for 2014, due to not being employed and did not receive a tax refund. The debtor was unable to work due to an injury for September thru November, she has since returned to work and will resume regular month payments.

PLEASE TAKE NOTICE that a telephone hearing will be held before the Honorable Susan V. Kelley, United States Bankruptcy Judge, on **December 22, 2015** at **11:00 AM** to consider the Trustee's Motion to Dismiss this case. To appear by telephone, you must call the Court conference line at 1-888-675-2535, access code 9918878 before the scheduled hearing time. Please note that the Court may already be in session, so please wait quietly on the telephone for your case to be called. The Debtor is welcome, but not required to participate in this hearing.

Dated: December 7, 2015.

DeLadurantey Law Office, LLC
Attorneys for Debtors

/s/

By: Nathan E. DeLadurantey
State Bar No. 1063937

Drafted by:
Matthew L. Hoenig
SBN 1097901
735 W. Wisconsin Avenue, Suite 720
Milwaukee, WI 53233
(414) 377-0515; Fax (414) 755-0860
matthew@delalaw.com

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:)
MICHELLE WOLFE) Case No. 13-23878-svk
) Chapter 13
)
Debtor.)

CERTIFICATE OF SERVICE

Matthew Hoenig states under oath that he is over the age of 18 and a attorney at DeLadurantey Law Office, LLC, attorneys for the debtors, and that on December 7, 2015, he delivered true and correct copies of the attached “Objection to Trustee’s Motion to Dismiss” and “Certificate of Service” via the CM/ECF system or first-class mail to the following parties:

Clerk, U.S. Bankruptcy Court
Eastern District of Wisconsin
via CM/ECF

Trustee Mary B. Grossman
via CM/ECF

Office of the United States Trustee
via CM/ECF

I certify under penalty of perjury that the foregoing is true and correct.

Executed on December 7, 2015.

Signed: /s/ Matthew Hoenig
Matthew Hoenig

Drafted by:
Matthew L. Hoenig
SBN 1097901
735 W. Wisconsin Avenue, Suite 720
Milwaukee, WI 53233
(414) 377-0515; Fax (414) 755-0860
matthew@de-la-law.com